

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

EMERGENCY CARE SERVICES :  
OF PENNSYLVANIA, P.C., *et al.* :  
Plaintiffs : NO. 1:19-CV-01195-SHR  
: Rambo, J.  
v. :  
:   
UNITEDHEALTH GROUP, INC., :  
*et al.*; :  
:   
Defendants. :  
\_\_\_\_\_

**PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY**  
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Pursuant to Local Rule 7.36, Plaintiffs respectfully submit the attached supplemental authority in opposition to Defendants' Motion to Dismiss (ECF Doc Nos. 22, 30, 48, 51)

The attached authority is from the action captioned *Fremont Emergency Services (Mandavia), Ltd., et al. v. UnitedHealth Group, Inc., et al.*, Case No. 2:19-CV-00832-JCM-VCF (D. Nev.). *See* Exhibit A. This action was brought by Plaintiffs' affiliates in Nevada and features allegations similar to those asserted here. In its Order dated February 20, 2020, the District of Nevada granted Plaintiffs' Amended Motion to Remand, finding that the claims at issue are not completely preempted by ERISA.

Dated: March 31, 2020

Respectfully submitted,

*/s/*Bridget E. Montgomery

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**CERTIFICATE OF SERVICE**

I, Bridget E. Montgomery, hereby certify that on March 31, 2020, I served the foregoing PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY upon all counsel of record via this Court's CM/ECF system, which services satisfies the requirements of the Federal Rules of Civil Procedure.

/s/ Bridget E. Montgomery

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